

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL ASSOCIATION OF
BROADCASTERS, SINCLAIR BROADCAST
GROUP, INC.,

Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,

Respondents.

Nos. 14-1154 & 14-1179

**MOTION FOR LEAVE TO INTERVENE
IN SUPPORT OF RESPONDENTS**

Pursuant to 47 U.S.C. § 402(e), 28 U.S.C. § 2348, Rule 15(d) of the Federal Rules of Appellate Procedure, and D.C. Circuit Rule 15(b), CTIA – The Wireless Association[®] (“CTIA”) hereby moves for leave to intervene in support of Respondents as a matter of right in these cases and any other cases that may be consolidated with them.

The National Association of Broadcasters and Sinclair Broadcast Group, Inc. are petitioning for review of an order of the Federal Communications Commission adopting rules to implement the Commission’s broadcast television spectrum incentive auction. *See* Report and Order, *Expanding the Economic and Innovation*

Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268, FCC 14-63, 29 FCC Rcd 6133 (rel. June 2, 2014).

CTIA actively participated in the agency proceedings below, and its interests will be substantially affected by this Court's review of the challenged order. CTIA is therefore entitled to intervene as a matter of right under 28 U.S.C. § 2348.

CTIA respectfully requests that it be granted leave to intervene in support of Respondents.

Respectfully submitted,

s/ Michael K. Kellogg

Michael K. Kellogg

Scott H. Angstreich

KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.

1615 M Street, N.W., Suite 400

Washington, D.C. 20036

(202) 326-7900

(202) 326-7999 (facsimile)

October 2, 2014

*Counsel for CTIA – The Wireless
Association[®]*

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL ASSOCIATION OF
BROADCASTERS, SINCLAIR BROADCAST
GROUP, INC.,

Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,

Respondents.

Nos. 14-1154 & 14-1179

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, CTIA – The Wireless Association[®] (“CTIA”) submits the following disclosure statement:

CTIA is a Section 501(c)(6) not-for-profit corporation organized under the laws of the District of Columbia and represents the wireless communications industry. Members of CTIA include service providers, manufacturers, wireless data and Internet companies, and other industry participants. CTIA has not issued any shares or debt securities to the public, and CTIA has no parent companies, subsidiaries, or affiliates that have issued any shares or debt securities to the public.

Respectfully submitted,

s/ Michael K. Kellogg

Michael K. Kellogg

Scott H. Angstreich

KELLOGG, HUBER, HANSEN, TODD,

EVANS & FIGEL, P.L.L.C.

1615 M Street, N.W., Suite 400

Washington, D.C. 20036

(202) 326-7900

(202) 326-7999 (facsimile)

October 2, 2014

*Counsel for CTIA – The Wireless
Association[®]*

CERTIFICATE OF SERVICE

I hereby certify that, on October 2, 2014, I filed the foregoing Motion for Leave To Intervene in Support of Respondents and Corporate Disclosure Statement with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit using the appellate CM/ECF system. I certify further that participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system. In addition, copies of the foregoing have been sent by first-class mail to the following:

Jon Sallet
General Counsel
Office of General Counsel
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, D.C. 20554

The Honorable Eric Holder
Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

s/ Michael K. Kellogg
Michael K. Kellogg